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August 7, 2018

VIA ECF

Honorable Paul A. Engelmayer
United States District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: Cintron v. Trump Organization LLC et al.
Civil Action No.: 1:18-cv-06921(PAE)

Dear Judge Engelmayer:

This firm represents defendants Trump Organization LLC and Trump Tower Commercial LLC ("Defendants") in the above-referenced matter. In accordance with Your Honor's August 2, 2018 Order (ECF Docket No. 5) (attached hereto as "**Exhibit A**") Defendants write to provide the information requested concerning Defendants' removal. Set forth below are Defendants' responses to Your Honor's inquiries:

1. Whether all defendants who had been served at the time of removal joined in the notice of removal.

The only two Defendants - Trump Organization LLC and Trump Tower Commercial LLC - were served with the Complaint on July 12, 2018 (prior to the August 1, 2018 removal) and joined in the removal.

2. Whether the notice of removal was dated more than 30 days after the first defendant was served.

Defendants were both served via the New York Secretary of State on July 12, 2018 and the notice of removal was filed on behalf of both Defendants on August 1, 2018 - 20 days after Defendants were served.



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3. If the action has been removed on the grounds of diversity jurisdiction, the citizenship of all named plaintiffs and all named defendants (including the citizenship of all members or partners in any non-corporate entity), if such states of citizenship were not set forth in the notice of removal.

Not applicable. This case was removed to federal court on grounds of original jurisdiction in that Plaintiff's Complaint alleges Defendants violated the overtime provisions of the federal Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*¹

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Howard M. Wexler

Howard M. Wexler

Enclosures

cc: Larry Hutcher Esq. (via ECF & First Class Mail)
Josh Krakowsky Esq. (via ECF & First Class Mail)

¹ Plaintiff also alleges that Defendants violated the New York Labor Law, Article 6, §§ 190 *et seq.*

